The Honorable Robert S. Lasnik 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 SHIQUAN FENNELL, No. 3:16-cv-05933-RSL 11 Plaintiff, STIPULATED MOTION [AND PROPOSED ORDER] FOR TWO-DAY EXTENSION OF 12 VS. FILING DEADLINE FOR DISPOSITIVE 13 **MOTIONS** PACIFIC MARITIME ASSOCIATION, a California corporation, and 14 INTERNATIONAL LONGSHOREMEN'S NOTE ON MOTION CALENDAR: & WARE-HOUSEMEN'S UNION, December 26, 2017 15 LOCAL 19, a Washington corporation, and INTERNATIONAL LONGSHORE AND 16 WAREHOUSE UNION, 17 Defendants. 18 **STIPULATION** 19 Having met and conferred about this, the parties stipulate, if allowed by the Court, to 20 extend the current deadline for filing dispositive motions from Tuesday, January 2 to Thursday, 21 January 4, 2018. 22 Moving the deadline from the 2nd (the day after New Year's Day) to Thursday, the 4th, 23 will not affect the noting date, which in either event would be the fourth Friday thereafter. 24 25 26

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1 DATED this 26th day of December, 2017. 2 By: s/Clemens H. Barnes By: s/Janelle E. Chase-Fazio 3 Janelle E. Chase-Fazio, WSBA No. 51254 Clemens H. Barnes, WSBA No. 4905 Kellen A. Hade, WSBA No. 44535 James W. Beck, WSBA No. 34208 4 MILLER NASH GRAHAM & DUNN LLP GORDON THOMAS HONEYWELL, LLP 1201 Pacific Ave Ste 2100 Pier 70, 2801 Alaskan Way Ste 300 5 Tacoma, WA 98402 Seattle, WA 98121-1128 Tel: (206) 624-8300 Tel: (253) 620-6500 6 Fax: (206) 340-9599 Fax: (253) 620-6565 Email: clem.barnes@millernash.com Email: jchase-fazio@gth-law.com 7 Email: ibeck@gth-law.com Email: kellen.hade@millernash.com Counsel for Plaintiff Counsel for Defendant 8 Pacific Maritime Association 9 By: s/Robert S. Remar By: s/Clifford D. Sethness Clifford D. Sethness, WSBA No. 14110 Robert S. Remar, Pro Hac Vice 10 LAW OFFICE OF ROBERT REMAR Jason S. Mills. Pro Hac Vice **MORGAN LEWIS & BOCKIUS** 1188 Franklin St 4th Fl 11 San Francisco, CA 94109 300 South Grand Ave Fl 22 Tel: (510) 499-1570 Los Angeles, CA 90071 12 Tel: (213) 612-1080 Email: rremar@remarlaw.com Email: clifford.sethness@morganlewis.com Counsel for Defendant ILWU and Local 19 13 Email: jason.mills@morganlewis.com Counsel for Defendant 14 Pacific Maritime Association 15 By: s/Kirsten B. White Kirsten B. White, Pro Hac Vice 16 **MORGAN LEWIS & BOCKIUS** One Federal Street 17 Boston, MA 02110 Tel: (617) 341-7541 18 Email: kirsten.white@morganlewis.com Counsel for Defendant 19 Pacific Maritime Association 20 21 22 23 24 25 26

STIPULATED MOTION AND ORDER FOR TWO-DAY EXTENSION OF FILING DEADLINE FOR DISPOSITIVE MOTIONS - 2 4850-6663-0233.1

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ORDER

Based on the forgoing Stipulation and good cause appearing, IT IS SO ORDERED. The dispositive motion deadline is moved from January 2 to January 4, 2018.

dated: <u>Jam. 4,201</u>8.

MWS Casuk rudge robert s. lasnik

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